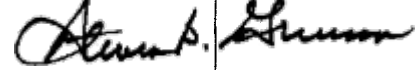


EXHIBIT A



1 **COM**

2 G. OLIVER MELGAR, ESQ.

3 Nevada Bar No. 10146

4 REVOLUTIONARY LAW

5 711 South 6th Street

6 Las Vegas, Nevada 89101

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10 *Attorney for Plaintiff*

CASE NO: A-22-853465-C
Department 9

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 DAVID BOGLE,

14 Plaintiff,

15 vs.

16 REGAL CINEMAS, INC., REGAL
17 COLONNADE, REGAL
18 ENTERTAINMENT GROUP, DOES I
19 through X, inclusive; and ROE
20 CORPORATIONS I through X, inclusive.

21 Defendants.

CASE NO.:

DEPT. NO.:

22 **COMPLAINT**

23 DAVID BOGLE, Plaintiff, by and through G. OLIVER MELGAR, ESQ. of the
24 law firm of REVOLUTIONARY LAW, sues Defendant and alleges as follows:

- 25 1. This is an action for damages in excess of Fifteen Thousand Dollars
26 (\$15,000.00), exclusive of interest and costs.
- 27 2. At all times material, Plaintiff, DAVID BOGLE, was a resident of Clark County,
28 State of Nevada.
3. At all times material, Defendant, REGAL CINEMAS, INC., REGAL
COLONNADE, REGAL ENTERTAINMENT GROUP was doing business in
Las Vegas, Nevada and is subject to jurisdiction in Clark County, Nevada.

- 1 4. Upon information and belief, at all times material herein, Doe and Roe
2 Defendants 1 through 200 were legal residents/entities of Clark County, Nevada,
3 and authorized to do business by the State of Nevada, and/or were employees,
4 agents, or servants of Defendants.
- 5 5. The true names and capacities of Defendants, Doe and Roe 1 through 200, are
6 unknown. Plaintiff alleges that the Defendants Doe and Roe 1 through 200 were
7 responsible for the Plaintiff's injuries; and are liable for Plaintiff's damages.
8 Plaintiff will ask leave of court to amend this Complaint and insert the names
9 and capacities of Doe and Roe 1 through 200 when they are discovered.
- 10 6. On or about July 6, 2021, Plaintiff DAVID BOGLE was lawfully on the
11 premises at Defendants REGAL CINEMAS, INC., REGAL COLONNADE,
12 REGAL ENTERTAINMENT GROUP property as a paying guest, (hereafter
13 "Defendants").
- 14 7. Plaintiff walked down the movie theater corridor and suddenly tripped and fell
15 on a lip of carpet exposing a round metal plug. Defendant's negligence caused
16 Plaintiff to trip and fall on the exposed carpet and the metal plug sticking up.
- 17 8. As a result, Plaintiff DAVID BOGLE, suffered severe bodily injury.
- 18 9. Defendants had notice of the hazard that caused Plaintiff harm.
- 19 10. Defendants property owed a duty to warn Plaintiff of perils that would
20 foreseeably harm him, including placing warnings of a hazard on the floor.
- 21 11. Defendants property knew or should have known that they owed a duty to
22 maintain a safe premise to protect persons such as plaintiff from harm, including
23 curing hazards on the walkway and ground.
- 24 12. Defendants property in maintenance of the movie theater and walkways, were
25 placed on notice or should have been placed on notice of the dangerous condition
26 of the cut up carpet and metal plug sticking out of the floor because a reasonable
27 person taking care of the property would have discovered and removed or
28 repaired it.

1 13. At all times material, Defendants' were in control of, and responsible for
2 maintaining the premises in a reasonably safe condition to protect persons, such
3 as Plaintiff, from harm.

4 14. Defendants breached their duty to Plaintiff in one or more of the following
5 respects, but not limited to:

- 6 a. Failure to exercise reasonable care in performing routine cleaning
7 maintenance of the premises.
- 8 b. Failure to warn guests of dangerous conditions on the premises.
- 9 c. Failure to inspect for dangerous conditions on the premises.
- 10 d. Failure to cure dangerous conditions on the premises.
- 11 e. Failure to follow safety protocol.

12 15. Defendants breached these duties directly and proximately caused Plaintiff's
13 injuries.

14 16. Plaintiff has suffered injury and damages in an amount in excess of \$15,000.00.

15 17. At all times material, Defendants' were in control of, and responsible for
16 training, hiring, and/or screening employees/contractors working on its premises,
17 in a way designed to protect persons such as Plaintiff from harm.

18 18. Defendants property breached their duty to Plaintiff in one or more of the
19 following respects, but not limited to:

- 20 a. Failing to adequately supervise employees, agents, contractors
21 and/or subsidiaries.
- 22 b. Failing to adequately train employees, agents, contractors and/or
23 subsidiaries.
- 24 c. Failing to adequately screen potential employees, agents, contractors
25 and/or subsidiaries before their hiring/contracting.
- 26 d. Failing to follow safety protocol.

27 19. Defendants breach of these duties directly and proximately caused Plaintiff's
28 injuries.

1 20. Plaintiff has suffered injury and damages in an amount in excess of \$15,000.00.

2 **WHEREFORE**, Plaintiff, expressly reserving her right to amend this complaint
3 at the time of, or prior to trial, prays for judgment against the Defendants', and each of
4 them, as follows:

- 5 1. For General and Special Damages sustained by Plaintiff in a sum in
6 excess of \$15,000.00;
7 2. For Attorney's Fees and Costs of suit incurred herein;
8 3. For interest at the statutory rate;
9 4. For such other relief as this Court deems appropriate.

10
11 Dated this 2 day of June, 2022.

12
13 BY: 

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